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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LEE REED,

Petitioner,

vs.

CALVIN JOHNSON, WARDEN, et al.,
Respondents.

CASE NO: 2:21-cv-00942-APG-EJY

**MOTION FOR EXTENSION OF TIME
TO FILE MR. LEE REED'S SIGNED
DECLARATION IN SUPPORT OF HIS
MOTION TO DISMISS GROUND 3.B OF
HIS PETITION FOR WRIT OF HABEAS
CORPUS**

(First Request)

COMES NOW, Petitioner LEE REED, by and through his counsel of record,
CHRISTOPHER R. ORAM, ESQ., and hereby files this Motion for Extension of Time to
File Mr. Lee Reed's Signed Declaration in Support of His Motion to Dismiss Ground 3.B of
His Petition for Writ of Habeas Corpus. Counsel requests that the deadline to file the Signed
Declaration in Support of His Motion to Dismiss Ground 3.B of His Petition for Writ of
Habeas Corpus, which is currently due on June 13, 2022, be extended by a period of ten (10)
days, until and including June 23, 2022.

Dated this 13th day of June, 2022.

Respectfully Submitted By:

/s/ Christopher R. Oram

Christopher R. Oram, Esq.
520 S. Fourth Street, Second Floor
Las Vegas, Nevada 89101
Attorneys for Petitioner Reed

POINTS AND AUTHORITIES

On April 30, 2022 this Court ordered Mr. Reed to file a motion for dismissal. Pursuant to the order Mr. Reed was to file his signed affidavit consenting to the motion for dismissal by June 13, 2022

Mr. Reed filed his motion to dismiss in a timely fashion. Mr. Reed has orally agreed to the motion to dismiss however, counsel has yet to receive the signed declaration. Upon information and belief, the declaration should be forthcoming.

For the reasons outlined above, as well as difficulties with prisoner's mailing during the Covid 19 pandemic, Mr. Reed respectfully requests that this Court grant the instant extension, which will allow counsel to file Mr. Reed's signed declaration as soon as it is received or by June 23, 2022.

Dated this 13th day of June, 2022.

Respectfully Submitted By:

/s/ Christopher R. Oram
Christopher R. Oram, Esq.
520 S. Fourth Street, Second Floor
Las Vegas, Nevada 89101
Attorneys for Petitioner Reed

IT IS SO ORDERED:

Dated: June 13, 2022



ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE